

C. DUKES SCOTT
EXECUTIVE DIRECTOR

P.O. Box 11263
Columbia, S.C. 29211



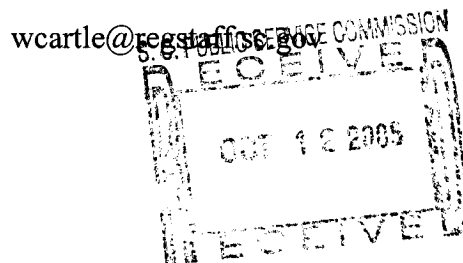
Phone: (803) 737-0800
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176253
DAN F. ARNETT
CHIEF OF STAFF

October 11, 2005

VIA U.S. MAIL

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210



Re: Petition of Budget Phone, Incorporated for Designation as an Eligible
Telecommunications Carrier
Docket No. 2005-219-C

Dear Mr. Terreni:

Please find enclosed for filing the Office of Regulatory Staff's First Continuing Data Request with respect to the above-referenced matter. By copy of this letter and Certificate of Service, all parties of record are being served with a copy of the First Continuing Data Request by U. S. Mail. Please clock in a copy of this filing and return it to us via courier.

Thank you very much for your assistance.

Very truly yours,

Wendy B. Cartledge
Wendy B. Cartledge

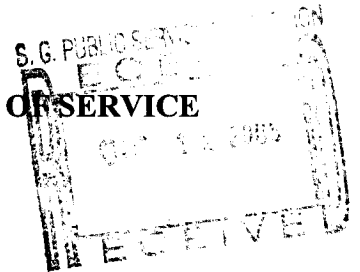
WBC/pkr
Enclosures

cc: M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
Ronald Munn, Jr., Director
Lance J. M. Steinhart, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2005-219-C

IN RE: Petition of Budget Phone,)
 Incorporated for Designation)
 as an Eligible)
 Telecommunications Carrier)

CERTIFICATE OF SERVICE




This is to certify that I, Patricia K. Ringer, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF THE REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

Ronald Munn, Jr., Director
Regulatory & Revenue Assurance
Budget Phone, Incorporated
Post Office Box 19360
Shreveport, LA, 71149

Lance J.M. Steinhart, Esquire
Lance J.M. Steinhart, P.C.
1720 Windward Concourse, Suite 250
Alphaetta, GA, 30005

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, SC, 29211



Patricia K. Ringer

October 11, 2005
Columbia, South Carolina

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2005-219-C

IN RE: Petition of Budget Phone, Incorporated)	OFFICE OF REGULATORY
for Designation as an Eligible)	STAFF'S FIRST CONTINUING
Telecommunications Carrier)	DATA REQUEST
_____)	

TO: Lance J.M. Steinhart, Esquire, Counsel for Budget Phone, Incorporated:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the within Data Requests upon Budget Phone, Incorporated (hereafter referred to as "Budget Phone" or "Incorporated").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy

of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to Budget Phone's proposed South Carolina retail operations.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to James McDaniel, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.
- IX. That Budget Phone provides six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that Budget Phone provides an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of Budget Phone's responses, the Budget Phones witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require Budget Phone to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

REQUESTS:

1. Does Budget Phone have Eligible Telecommunications Carrier ("ETC") designation in any other state? If the company has received ETC designation, please provide listing of the states. Has the company received this designation in areas served by rural carriers?
2. Was this designation received by way of approval by a State Commission or the Federal Communications Commission?
3. Does Budget Phone provide federally supported services using its own facilities or combination of its facilities and the resale of another carrier's service throughout the service areas where Budget Phone is seeking ETC designation?
4. Explain how Budget Phone will advertise the availability of the supported services and associated charges as well as the Link Up and Lifeline services.
5. Will Budget Phone have the necessary resources and commit to serve all customers within the service area where it seeks ETC designation?
6. Explain how Budget Phone will remain functional during emergency situations.
7. Explain how Budget Phone will meet the consumer protection and quality of service standard of the Public Service Commission of South Carolina.
8. Explain how Budget Phone provides local service comparable to the service offered by incumbent local exchange carriers.
9. If all carriers within the designated service area withdraw their ETC designation, will Budget Phone agree to provide equal access to consumers within the service area?
10. Does Budget Phone have a formal plan demonstrating how the company will use universal service support to improve service within the service area where it seeks ETC designation?
11. Provide a five-year plan describing with specificity Budget Phones proposed improvements or upgrades to its network on a wire center-by-center basis throughout the designated service area.

10. Provide the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high cost support.
11. Provide the specific geographic areas where improvements will be made.
12. Estimate the population that will be served as a result of the improvements.
13. Provide an explanation of the public interest benefits associated with the requested ETC designation.

October 11, 2005

Wendy B. Cartledge

Wendy B. Cartledge Esquire
Florence P. Belser, General Counsel
Office of Regulatory Staff
P.O. Box 11263
Columbia, South Carolina 29211
(803) 737-0863